

Message

Sent: 8/7/2019 6:57:36 PM
Subject: Air Briefing

- Air Permits
 - NSR and Title V, all are delegated
 - Most interactions are with the DEQ/CEQs
 - NSR – Most mature
 - Pre-construction program: Minor NSR, major NSR, and NNSR.
 - So this applies to any new construction
 - Title V
 - This is the operating side of things.
 - Designed to include all of a facility's requirements in a single document (Title V permit). Doesn't add any new conditions, just consolidates existing.
 - Gave EPA ability to veto permits (not applicable to NSR)
 - Also has enhanced public participation. Public comment before permit issuance. Can petition EPA if public thinks permit isn't consistent with the CAA.
 - 17 petitions in house.
 - 3900 Title V permits (25% of the nation Title V permits), with 2400 of those in Texas alone.
 - Oversight responsibilities.
 - Direct implementation on tribal lands and offshore.
 - NSR construction permits and Title V permits on tribal lands. Not a huge workload, but some controversies (e.g., Monarch Waste Technologies by Nambe).
 - No tribal nations are authorized to issue permits. Sometimes they are treated as an adjacent state.
 - Offshore
 - 5 pending PST Title V permits for offshore crude oil exploration. For LNG, expecting another 4 next year.
 - Air permitting (construction and operational) in federal waters.
 - Only one completed application so far, working on that one.
 - 2 want case-by-case MACT.
 - Get a specific briefing on this one?
 - Likely public comment on one this fall.
- Air Planning
 - NA areas
 - If flaring SO₂, you get H₂S.
 - SO₂ – Proposed RM by August 23rd for error correction saying NA classifications were made in error, and should have let areas rely on modeling instead of Sierra Club monitoring. All 3 SO₂ NAs in Texas are in the error correction. Monitor has been running there for almost 2 years at Martin Lake (assuming NA at end of 3-year period).
 - PM₁₀ – mostly wind-blown dust issues there.
 - Marginal (3 years), moderate (6 years), serious (9 years), severe (15 or 17 years), extreme (20 years).
 - Major source size drops as you go up the scale, so a modification is easier to trigger.
 - SIPs
 - Arkansas will be withdrawing 6 SIPs (5 are backlogged) this fall.